IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

JENNIFER PHILLIPS and TONYA BUSH, individually, and on behalf of all others similarly situated, Plaintiffs, vs. HELP AT HOME, INC., HELP AT HOME, LLC, STATEWIDE HEALTHCARE SERVICES, INC., STATEWIDE HEALTHCARE SERVICES, LLC, HAH GROUP HOLDING COMPANY, LLC, and RONALD FORD, Defendants.	No. 15 cv 8954 Magistrate Judge Sheila Finnegan

STIPULATION REGARDING PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

On October 8, 2015, Plaintiffs filed their Complaint. (DE 1). Simultaneously, Plaintiffs filed a protective *Motion for Class Certification* ("Motion"), pursuant to *Damasco v. Clearwire Corp.*, 662 F.3d 891 (7th Cir. 2011), to prevent Defendants from mooting the case with a Fed. R. Civ. P. 68 offer of judgment or otherwise. (DE 3). The Court has not yet set a briefing schedule on Plaintiffs' Motion. The parties submit this stipulation to resolve Plaintiffs' Motion.

Defendants stipulate that they will not make any Rule 68 offer of judgment, or otherwise tender purportedly full relief in an attempt to moot Plaintiffs' ability to seek individual relief or class certification until after the Court has ruled on the issue of class and collective certification. Plaintiffs stipulate that their protective Motion should be denied without prejudice, and that Defendants do not need to file a response to the Motion. This stipulation reflects the Court's request that the parties enter into a stipulation on this issue. In signing this stipulation, no party shall be deemed to have waived any claims or defenses otherwise available to it.

Plaintiffs JENNIFER PHILLIPS and TONYA BUSH, individually, and on behalf of all others similarly situated, By: s/Thomas A. Zimmerman, Jr. Thomas A. Zimmerman, Jr. *tom@attorneyzim.com* Amelia S. Newton *amy@attorneyzim.com* Matthew C. De Re *matt@attorneyzim.com* Nicholas J. Hagman *nick@attorneyzim.com* ZIMMERMAN LAW OFFICES, P.C. 77 West Washington Street, Suite 1220 Chicago, Illinois 60602 (312) 440-0020 telephone (312) 440-4180 facsimile www.attorneyzim.com Counsel for Plaintiffs and the putative Class	Defendants HELP AT HOME, INC., HELP AT HOME, LLC, STATEWIDE HEALTHCARE SERVICES, INC., STATEWIDE HEALTHCARE SERVICES, LLC, HAH GROUP HOLDING COMPANY, LLC and RONALD FORD, By: s/Siobhan M. Murphy Siobhan M. Murphy *smurphy@lbbslaw.com* John J. Michaels, Jr. *john.michels@lewisbrisbois.com* Johner Taylor Wilson, III *johner.wilson@lewisbrisbois.com* Dawn L. Johnson *dawn.johnson@lewisbrisbois.com* LEWIS BRISBOIS BISGAARD & SMITH LLP 550 West Adams Street, Suite 300 Chicago, Illinois 60661 Counsel for Defendants

CERTIFICATE OF SERVICE

Thomas A. Zimmerman, Jr., an attorney, hereby certifies that he caused the foregoing document, to be served upon all counsel of record in this case via the Court's CM/ECF System, prior to 5:00 p.m., on this day December 31, 2015.

s/Matthew C. De Re